



U.S. Department of Justice

United States Attorney
Eastern District of New York

CK:TK
F.#2010R00420

271 Cadman Plaza East
Brooklyn, New York 11201

August 15, 2011

BY HAND and ECF

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Re: United States v. Pedro Espada Jr., et al.
Criminal Docket No. 10-985 (S-1) (FB)

Dear Counsel:

Pursuant to Federal Rule of Criminal Procedure 16(a)(1)(G), this letter serves as notice of the government's intention to offer expert testimony in handwriting analysis.

Enclosed please find the curriculum vitae for William M. Riordan, who conducted the handwriting analysis connected with this case. A copy of his reports was furnished to you on August 11, 2011. Mr. Riordan will testify about his comparison of handwriting exemplars taken from the defendants with the handwriting found on various documents provided to the government by the accounting firm Marks, Paneth and Shron.

If you have any further questions or requests, please do not hesitate to contact us.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: /s/
Colleen Kavanagh
Todd Kaminsky
Assistant U.S. Attorneys

Enclosures

cc: Clerk of Court (FB) (w/o enclosures)